

STATE OF MISSOURI

Pat Carnahan, Governor • David A. Shorr, Director

## DEPARTMENT OF NATURAL RESOURCES

DIVISION OF ENVIRONMENTAL QUALITY

P.O. Box 176 Jefferson City, MO 65102-0176

October 11, 1996

Mr. Steven Kinser  
Remedial Project Manager  
U.S. EPA, Region VII  
726 Minnesota Avenue  
Kansas City, KS 66101

Dear Mr. Kinser:

This letter addresses the request of the Martha Rose Steering Committee to terminate ground water monitoring at the Martha Rose Chemical site in Holden, Missouri. Comments from the June 6, 1996, meeting was forwarded to the Missouri Department of Health (DOH) and Division of Geology and Land Survey (DGLS). After review of the comments and pertinent site data, both agencies felt termination of groundwater monitoring at the Martha Rose Chemical site at this time would be premature. I agree with their decision.

The reasons for the decision are:

Monitoring of groundwater since the completion of remedial activities has not produced any results from the wells that initially indicated PCB contamination, MW-204 and MW-207 (now MW-207R). Without data from these wells there is no way to access the effects of the remedial activity.

MW-210 has indicated increasing concentrations of VOCs and SVOCs. Although the levels are lower since the remedial activity, there is a need to continue monitoring to determine if the increasing values warrant further concern.

Shallow groundwater, and the contaminants transported by it, will move to the southwest and eventually discharge to the unnamed tributary of East Pin Oak Creek. Contaminants discharged to the tributary pose a threat to humans through dermal contact and livestock through ingestion.

We do not consider continued groundwater monitoring of a site as severely contaminated as the Martha Rose site to be unreasonable. Rather, it is a minimal effort, which will provide information on the movement of the plume and natural attenuation of the contaminants. Indeed, many states which recognize natural attenuation as a remedial measure **require** monitoring, as well as other measures, as minimum requirements instead of active remediation.